

July 2, 2005

Mr. Ron DeHaven  
APHIS Administrator  
USDA

Dear Mr. DeHaven:

As a representative of a large number of miniature pig owners in the United States, we would like to comment on the proposed National Animal Identification System (NAIS) by the USDA.

The miniature pigs in this country (mostly Vietnamese Potbellied pigs, Kune Kune pigs and other exotic breeds of miniatures) are not raised as food animals and will never enter the US food chain. They are bred, sold and kept primarily as pets and companion animals, much as one would a dog, cat or other more traditional companion animal. Most stay in their homes for their entire lives and receive regular veterinary care, vaccinations, veterinary check-ups, and daily care as would any companion animal. We fully recognize that miniature pigs are subject to and can transmit the same diseases as commercial swine.

The NAIS standards, as they are currently proposed, do **not** indicate whether pets normally classified as livestock, such as the miniature pigs, will be subject to the proposed NAIS requirements. If they were to be included, every individual in the US who owns a pig as a pet/companion animal would be required to have a premise identification number and their pet pig(s) would have to be marked and identified as required. This would require USDA and the states to supervise thousands more premises for a relatively small number of pigs who, realistically, pose no threat to the food chain in the first place. It would also create an enforcement problem as well as a huge education problem for USDA as many pet pig owners would simply not apply for a premise identification number and new pet pig owners would need to be educated on the requirement to do so.

If it is the intention of the USDA to include the thousands of "pet pigs" in the US in the NAIS, despite the fact that they will never enter or impact the food chain, we would like to request, at minimum, a temporary exemption for the miniature pigs from the provisions of the NAIS until such time as representatives from the pet pig community can meet with USDA officials and discuss what, if anything, can be done to meet the goals of the NAIS while, at the same time, minimizing the impact on the large numbers of miniature pigs kept as pets and their caretakers.

The International Potbellied Pig Registry (IPPR) and the North American Potbellied Pig Association (NAPPA) have created a registration and tracking plan for miniature pigs, which we feel may address many of the mutual concerns we share. A draft copy of this plan is attached. NAPPA is also currently developing bio security guidelines involving the transportation and housing of pet pigs of in private homes, sanctuaries and breeding

facilities. These guidelines will be ready for presentation to our joint membership and the pet pig community by the end of the summer. We are forming a small "working group" of professional individuals who represent a cross section of the miniature pig community, including pet pig owners, breeders and sanctuary directors who would like to be involved in any USDA discussions or planning sessions with regard to the miniature pigs and their treatment under the developing NAIS. We believe that by working together; we can offer the USDA a sound plan that complies with the spirit of the NAIS goals.

I am available to answer any additional questions you may have and we look forward to working closely with the USDA in the future.

Respectfully submitted,

A handwritten signature in cursive script that reads "Lorelei Ling Pulliam". The signature is written in black ink and is positioned below the "Respectfully submitted," text.

Lorelei Ling Pulliam  
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Board of Directors Member-International Potbelly Pig Registry  
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## **New Proposal for NAPPA Certified Breeders List**

*The Presidents of IPPR and NAPPA have together developed an exciting new proposal. Both Jenny Blaney (IPPR President) and Jamie Holley (NAPPA Interim President) have considered carefully the input from the potbelly pig industry, breeders, sanctuaries, and pet pig owners. We feel that this proposal would most benefit both organizations.*

***The proposal is for the NAPPA Certified Breeders list to be moved from NAPPA to IPPR where it becomes the IPPR Contract Breeder Program.***

IPPR as a registry already deals with breeders on a regular basis. One of IPPR's goals is to register and track as many potbelly pigs as possible. IPPR sanctions shows, tracks genetics, participates in ongoing medical monitoring with the Duchess fund, and promotes better breeding practices. Because of all this, IPPR is the logical place to have a breeders program.

*This proposal will in turn allow NAPPA to concentrate on the potbelly pig as a pet and focus more on education, promotion of sanctuaries and adoptions, zoning issues and funding for all of the above.*

We have included information that both organizations will have to consider in order for this to be an easier transition.

IPPR provides two sets of standards

1. Breed Standard-Insures the preservation of the integrity and quality of the potbelly pig as a breed. IPPR Contract Breeders breed to this standard.
2. Pet pig standard-encompasses the many different body styles and conformation traits of the different bloodlines for identification and screening purposes so as to distinguish potbelly pigs from other pig breeds.

Photos of pigs demonstrating each of these categories can (will soon) be found on the IPPR website.

IPPR works closely with the Duchess Fund to preserve confidentiality and shares medical and genetic information only. A Confidentiality form will be available to any pig owner who registers with IPPR.

**IPPR proposes the following for the Contract Breeders program.**

- Adhere to recommended IPPR breeding policies

All breeding stock must be registered with IPPR (class A, B, or Five generations)  
No One pig should appear more than one time on a 4-generation pedigree  
Sows and gilts must be kept separate from Boars  
Documentation must be kept on all breeding pigs  
Piglets sold as pets (not for breeding) must be neutered or spayed.

Each breeder will keep on file with IPPR a copy of his or her current sales contract. This contract will specify the breeder's terms concerning the return policy for the protection of the breeder, buyer and pet pig(s).

If a breeder is contacted by a shelter and informed that the shelter has acquired one or more of said breeder's pigs, said breeder will help make arrangements for the return of said pig(s), or help that shelter financially for the cost/upkeep until said pig(s) is placed in a permanent home. The breeder will also provide said shelter with history of the pig(s) and background information of contacts with the buyer of said pig(s) along with any registration information.

Etc, Etc...a work in progress by the IPPR Board

- Adhere to biosecurity guidelines for breeders set by IPPR

IPPR has been given permission to use Dr. Carr's biosecurity measures as a guideline for breeders to follow.

<http://www.vetmed.iastate.edu/departments/vdpam/swine/petpigs/biosecurity>

#### Arrival and Isolation

1. The isolation area must be run as a separate home. Ensure the pigs can not escape from their isolation area.
2. To enter the isolation area you must have separate outer-clothing and boots.
3. Wear specific outer-clothing and boots when handling the new pigs.
4. Wash your hands.
5. All feeding utensils and water utensils must be separate and thoroughly disinfected between pigs or groups of pigs.
6. If treatments are necessary, the medicines, needles and syringes used must be disposable and not moved back to the home.
7. All bedding materials must be separate and burnt once used.
8. It is essential to wash your hands and change your other clothing before handling your own home pigs.
9. It is strongly advised to have the pig examined by a veterinarian soon after arrival and again prior to allowing the pig into the home. He or she may advise medication protocols for the new pig.
10. Hand feed pig and ensure that there is plenty of fresh water available.
11. Ideally use feed that the pig has been used to previously. It is essential that the pig start to eat promptly to prevent stomach ulcers.

- Adhere to IPPR breeding herd health maintenance guidelines

The NAPPA certified breeder check-off list with change as decided by the IPPR board. [www.petpigs.com](http://www.petpigs.com) Certified breeders list/ breeder code of ethics

1. All pigs on premises are free from disease and their physical condition indicates they are fed and watered properly.

2. Breeding gilts, sows, and boars are separated so that accidental breeding is avoided.
  3. Breeding gilts and sows are at least 6 months (used to be 9 months) old prior to breeding.
  4. All pigs are vaccinated and wormed following the breeder's vet of record advice or contact IPPR for assistance.
  5. All males are neutered prior to sale as pets.
  6. All animals sold as pets are recommended to be permanently identified. All animals sold as breeders must be permanently identified. *Microchip is considered to be the most permanent but is expensive. This should be considered when applying this to breeding animals already on hand and pet sale costs.*
  7. All animals are provided with:
    - a. Sufficient pen space. (Pigs are grazers and pen area should be large enough to allow for this behavior, or the pig should have daily access to such an area.
    - b. Ample shade and water for cooling themselves. (example, a child's wading pool or turtle sand box under a tree)
    - c. Appropriate living quarters with adequate bedding.
    - d. A non-stressful and sanitary environment. (area that is easily cleaned to be kept disease free)
- Pre-register with IPPR PIG(lets) to be sold
  - Refer inquiries to qualified sanctuaries when appropriate.  
*IPPR will put a link on their breeder's page to the NAPPA certified sanctuary list. NAPPA will put in place of its Certified breeder's page a link to the IPPR Contract Breeders page as well as to NAPPA certified sanctuaries.*
  - IPPR should establish a Breeder ethics committee.  
 This committee should be diverse and consist of persons outside the board that are breeders, shelters, pet pig owners and professionals as well as board members.

NAPPA may be relinquishing control of their Breeders program, however they will be gaining increased membership and support by the potbelly pig industry. The energy that has been put into maintaining the NAPPA Certified Breeder program can now be focused on the *PET PIG and its owners* by promoting adoptions and sanctuaries as well as addressing zoning issues more thoroughly.

### **NAPPA proposes the following for their members.**

- Maintain the Certified Shelter list and Shelter Ethics.  
 The Certified Shelters will receive a free web page for posting of pigs for adoption with picture and text changes made once a month and other (design)

changes once every six months. NAPPA-Net is in charge of this now for the breeders and shelters. [www.petpigs.com](http://www.petpigs.com) Certified shelters/ Code of Ethics

If a shelter receives a pig(s) from a known breeder, the shelter must inform said breeder of the circumstances under which they received the pig(s). In return, the breeder will provide said shelter with history of the pig(s), background information and of contacts with the buyer of said pig(s) along with any registration information.

The shelter will make arrangements with the breeder for the return of the pig(s) or ask the breeder to help with the cost/upkeep of said pig(s) until they are placed in a permanent home.

- NAPPA will look at its new category of Breeder/Shelter persons and decide how this list would fit into the picture.

*It is felt that breeders who also do on premise rescue should get some type of recognition.* This rescue does not include their own pigs they have breed and have been returned to them. (Possibly having on what is now the breeder page, those Breeders who also rescue on premise the same options with membership fee and the same web page options or do away with this category completely.)

*This category, if kept, would have to adhere to the IPPR Contract Breeder Program as well as the NAPPA Certified Shelter Program.*

- NAPPA has established a Biosecurity committee that consists of NAPPA and IPPR board members and as well as shelters and breeders that will create a biosecurity protocol to help the pet pig owner do their part for homeland security.

Dr. Carr has given NAPPA permission to use his pet pig biosecurity list as a guideline.

<http://www.vetmed.iastate.edu/departments/vdpam/swine/petpigs/biosecurity>

- NAPPA will consider initiating a comment page on the website where pet pig owners can read about services provided by breeders and sanctuaries.

New pet pig owners can tell other possible pig owners about their experience with a shelter or breeder and/or a shelter and breeder can tell of experiences with new owners.

- NAPPA will establish minimum guidelines for the potbelly pet pig owner to follow for the safe and healthy maintenance of their pets.

These guidelines can be taken from the IPPR herd health maintenance, the NAPPA Breeder's guidelines and Shelter guidelines that may include suggestions for adequate housing, pens/environment for living, health issues and guidelines for veterinary checkups and shots.

- NAPPA has decided to not establish a potbelly pig standard, but will put up a history of the pet pig along with pictures of the different bloodlines and crosses

(This may be in the Zoning packet as well as on NAPPA's website). This could serve as reference to assist Pet pig owners to make sure they are getting a potbelly pig, help with zoning issues, and aid veterinarians to identify potbelly pigs for certification to obtain pet pig registration papers. Photos of pigs demonstrating each bloodline hopefully will soon be found on the NAPPA website.

Both NAPPA and IPPR will benefit greatly from this proposal. But even more important, the Potbelly pig as a pet is the one that will benefit the most.

***This proposal will not go into effect until the new IPPR Board has completed its new business.***

NAPPA's motto is to **promote and protect the potbelly pig**. This change will allow us to concentrate on the issues of zoning and shelters. It should help us to know that IPPR is now the one to guide the pet pig owner through the regulation of the breeders. NAPPA is now free to go on to new and exciting prospects.

The presidents of NAPPA and IPPR hope that the board members are excited about this prospect as we were when the idea came up and we were able to see the "big picture" of how this could be beneficial to the potbelly pig industry as a whole.

Thanks for your consideration and Happy Discussions;

Jenny Blaney  
IPPR President

And

Jamie Holley  
NAPPA Interim President.